

1 WEIL, GOTSHAL & MANGES LLP  
Richard W. Slack (*pro hac vice*)  
2 (richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
3 (jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
4 (matthew.goren@weil.com)  
New York, NY 10153-0119  
5 Tel: (212) 310-8000  
6 Fax: (212) 310-8007

7 KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
8 (tkeller@kbbkllp.com)  
Peter J. Benvenutti (#60566)  
9 (pbenvenutti@kbbkllp.com)  
Jane Kim (#298192)  
10 (jkim@kbbkllp.com)  
650 California Street, Suite 1900  
11 San Francisco, CA 94108  
12 Tel: (415) 496-6723  
Fax: (650) 636-9251

13 *Attorneys for Debtors and*  
14 *Reorganized Debtors*

15 **UNITED STATES BANKRUPTCY COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC**  
22 **COMPANY,**

23 **Debtors.**

- 24 ☐ Affects PG&E Corporation  
25 ☐ Affects Pacific Gas and Electric Company  
26 ☒ Affects both Debtors

27 *\* ALL PAPERS SHALL BE FILED IN THE*  
28 *LEAD CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

**REORGANIZED DEBTORS' QUALIFIED  
ACCEPTANCE OF TENTATIVE RULING  
ON MOTION FOR ENTRY OF AN ORDER  
EXTENDING DEADLINE FOR THE  
REORGANIZED DEBTORS TO OBJECT  
TO CLAIMS**

Date: November 17, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: **(Telephonic or Video Only)**  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

**(Hearing to be canceled)**

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”),  
2 as debtors and reorganized debtors (collectively, the “**Reorganized Debtors**”) in the above-  
3 captioned chapter 11 cases (the “**Chapter 11 Cases**”), have received the Court’s tentative ruling on  
4 its *Motion for Entry of an Order Extending Time for Reorganized Debtors to Object to Claims* (the  
5 “**Motion**”). The Debtors accept the tentative ruling, subject to the following qualification:

6 As set forth in its limited opposition, the United States has filed “a number of substantial Class  
7 4B Utility General Unsecured Claims” against the Utility. The Debtors are aware of several claims that  
8 are identified as claims of the United States (e.g., “United States Department of Agriculture” and  
9 “United States of America on behalf of its Nuclear Regulatory Commission”), as well as claims that  
10 are claims of the United States but would not be located in a database search for “United States”  
11 (e.g., “Department of the Interior - Bureau of Land Management”). Thus, to insure that the parties  
12 have the same understanding as to the total universe of claims of the United States asserted in the  
13 Chapter 11 Cases, the Reorganized Debtors request that the United States identify all of its claims so  
14 that unidentified claims of the United States are not inadvertently allowed prior to the Reorganized  
15 Debtors completing their reconciliation of such claims. A proposed revised form of order on the  
16 Motion, revised with (new) paragraph 4 to reflect the Court’s ruling and the request contained herein,  
17 is attached hereto as **Exhibit A**.

18 On November 15, 2020, counsel for the United States advised the undersigned that the  
19 proposed order is acceptable in form to the United States.

20 Dated: November 16, 2020

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER BENVENUTTI KIM LLP**

21  
22 /s/ Tobias S. Keller  
Tobias S. Keller

23 *Attorneys for Debtors and Reorganized Debtors*  
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